

1 ALICE CHANG (SBN 239761)
2 alicechangjdmba@gmail.com
3 13048 Del Monte Dr, Apt 42F
4 Seal Beach, CA 90740
5 Telephone: (714) 507-6161

6 Attorneys for Plaintiffs-Relators

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **UNITED STATES OF AMERICA**
11 *ex rel.* **IONM LLC**, a Delaware
12 corporation and *ex rel.* **JUSTIN**
13 **CHEONGSIATMOY, M.D.; STATE**
14 **OF CALIFORNIA** *ex rel.* **IONM**
15 **LLC**, a Delaware corporation and *ex*
16 *rel.* **JUSTIN CHEONGSIATMOY,**
17 **M.D.; LOS ANGELES COUNTY** *ex*
18 *rel.* **IONM LLC**, a Delaware
19 corporation and *ex rel.* **JUSTIN**
20 **CHEONGSIATMOY, M.D.; and**
21 **JUSTIN CHEONGSIATMOY,**
22 **M.D.**, in his individual capacity,

23 Plaintiffs,

24 v.

25 **UNIVERSITY OF SOUTHERN**
26 **CALIFORNIA**, a California
27 corporation,

28 and

USC CARE MEDICAL GROUP,
INC., a California corporation,

Defendants.

Case No. 2:18-cv-08311-WLH (AS)

**NOTICE OF REQUEST TO
EMAIL ATTORNEY CHANG BY
FEBRUARY 2, 2024 WITH ALL
TRUE AND CORRECT CASE
CORRESPONDENCE WITH
THE COURT FOR WHICH
ATTORNEY CHANG WAS NOT
INCLUDED**

PLEASE TAKE NOTICE of this request to email Attorney Chang by February 2, 2024 with all true and correct case correspondence with the Court for which Attorney Chang was not included. See Attorney Chang's July 4, 2023 request for all correspondence with Judge Sagar to include Defendants' unilateral submission of the "Stipulated" Protective Order to Judge Sagar's chambers, which Judge Sagar granted

1 at Dkt. 180, despite the fact that Defendants' unilateral submission of the "Stipulated"
2 Protective Order violated both Central District of California Court's Local Rules and
3 Judge Sagar's own rules. See also Dkt. 239 at Pages 18-20 and 25.

4 Defendants still have not complied with Attorney Chang's January 21, 2024
5 written request to email Attorney Chang with all ex parte communications Defendants
6 made in this case and to email Attorney Chang with all records all individuals and/or
7 parties who signed Exhibit A of the Protective Order, agreeing to be bound by the
8 terms. See Dkt. 280 at Pages 6-7.

9 All parties served with this NOTICE either via the Central District of California
10 Court Notice of Electronic Filing and/or served via email (see Proof of Service linked
11 to this Notice) should hereby take notice of this request to email Attorney Chang by
12 February 2, 2024 with all true and correct case correspondence with the Court for
13 which Attorney Chang was not included.

14 This request is urgent and time-sensitive in light of the Paul Hasting law firm's
15 January 31, 2024 request for a court order to withdraw as counsel of record (Dkt.
16 284). An example referencing Paul Hasting law firm's ex parte communications with
17 the Court is attached hereto as **Exhibit A**. Paul Hastings is and was Defendants'
18 counsel of record including on the dates referenced above.

19 Prior the Court granting any withdrawal of any counsel of record in this case,
20 all case correspondence with the Court for which Attorney Chang was not included
21 must be emailed to Attorney Chang.

22 Dated: January 31, 2024

23 _____
24 /s/ Alice Chang
25 Alice Chang, Attorneys for Plaintiff-Relators
26
27
28

Exhibit A

From: **Bailey, Rebekah** <bailey@nka.com>

Date: Fri, May 20, 2022 at 11:07 AM

Subject: Redaction Needed in Today's Filing

To: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, paulcane@paulhastings.com <paulcane@paulhastings.com>, alicebrown@paulhastings.com <alicebrown@paulhastings.com>

Cc: Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdmdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

Counsel,

It appears Defendants have filed documents containing Plaintiff's social security number. Please contact the clerk of the court and address this today.

Thank you,

Rebekah

From: **Cane, Paul** <paulcane@paulhastings.com>

Date: Fri, May 20, 2022 at 11:14 AM

Subject: Re: Redaction Needed in Today's Filing

To: Bailey, Rebekah <bailey@nka.com>

Cc: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, Brown, Alice <alicebrown@paulhastings.com>, Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdmdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

We are contacting the clerk to see if we can file a redacted version. Sorry, that was inadvertent. Is there anything else there that you regard as confidential?

Paul

From: **Bailey, Rebekah** <bailey@nka.com>

Date: Fri, May 20, 2022 at 12:10 PM

Subject: RE: Redaction Needed in Today's Filing

To: Cane, Paul <paulcane@paulhastings.com>

Cc: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, Brown, Alice <alicebrown@paulhastings.com>, Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdmdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

Thank you Paul. It appears you also filed his passport number, home address, birthday, and driver's license in violation of the ECF filing certification. Refer to Rule 5.2 and L.R. 5.2-1 for rules on redacting this information.